

REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested. Claims 1-3, 5-14 and 16-21 are pending in the application. No claim amendments are presented, thus, no new matter is added.

In the outstanding Official Action, Claims 1-21 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,905,777 to Foladare et al. (hereinafter Foladare). Applicants respectfully traverse this rejection as independent Claims 1 and 11 recite novel features clearly not taught or rendered obvious by the applied reference.

Amended independent Claim 1 recites, a device in a communication network having multiple sub-networks, where each of the sub-networks includes services that may be different from that of other sub-networks, comprising, *inter alia*;

...wherein said service request is a request to initiate a conference connection, and the information processor is configured to communicate with at least one of the plurality of sub-networks to automatically establish the requested conference connection.

Support for the above emphasized “conference connection” feature can be found at p. 9, lines 2-10 of the specification, which describes that the requested service can be to arrange conference connection between various ingoing parties. After receiving such a request, the processors communicate to determine a processor that can handle the request to implement the requested conference connection. Once a suitable processor is identified, the connection may be automatically established.

Independent Claim 11, while directed to an alternative embodiment, recites substantially similar features. Accordingly, the remarks presented below are applicable to each of independent Claims 1 and 11.

Turning to the applied reference, Foladare discloses a communication system including an E-mail server and an E-mail network, in which useful E-Mail messages can be

identified, separated from junk mail, and forwarded as directed by the recipient.¹

Specifically, Foladare allows a user to create database setting indicating whether a received e-mail is important enough for a user to receive an immediate notification of receipt. Once the user receives an indication that an e-mail is received, which fits into a predetermined category of importance (e.g., based on sender or subject line, for example), the user is then able to send a signal back to the system requesting that the e-mail be forwarded to a selected destination (see col. 5, lines 15-38).

Foladare, however, fails to teach or suggest accepting a service request, which “*is a request to initiate a conference connection, and the information processor is configured to communicate with at least one of the plurality of sub-networks to automatically establish the requested conference connection,*” as recited in independent Claim 1.

In addressing this claimed feature, the Official Action cites col. 3, line 46; col. 5, line 25; col. 5 lines 47-50; and col. 6, lines 35-39 of Foladare. These cited portions of Foladare describe that an e-mail message entitled “Meeting Notice” may be prepared at a personal computer and addressed to a recipient. As discussed above, a preview of the e-mail message is then sent to a user’s personal communication device, and based on the displayed sender and subject, the user selects where the e-mail message should be routed.

Thus, Foladare simply describes that the subject of an e-mail sent to the user of his system may include the title “Meeting Notice.” This e-mail is not a *request to initiate a conference connection*, as is the claimed request. Instead, the e-mail is a conventional e-mail with a subject line indicating the substance of the message. Further, Foladare does not include a processor that *communicates with at least one of the plurality of sub-networks to automatically establish the requested conference connection*. As discussed above, the e-

¹ See Foladare in the Abstract.

mail entitled "Meeting Notice" is just an e-mail addressed to the user and is not a request that causes a processor to automatically establish a conference connection.

Therefore, Foladare, fails to teach or suggest accepting a service request, which "***is a request to initiate a conference connection, and the information processor is configured to communicate with at least one of the plurality of sub-networks to automatically establish the requested conference connection,***" as recited in independent Claim 1.

Further, Foladare fails to teach or suggest an information database configured to identify the different services associated with the sub-networks, ***the different services including protocol translations required to provide the requested service*** (i.e., conference connection), ... wherein the information processor is further configured to retrieve sub-networks available to provide the requested service (i.e., conference connection) ***based on the different services identified from the database,*** as recited in independent Claim 1.

The Office Action indicates that Applicants' previously filed remarks, concerning the protocol translations recited in independent Claim 1, were not persuasive because Foladare "disclose this limitation in at least Figure 3-402," and it is "inherent to have protocol translations in order to provide for a data message from a computer to be translated for a fax, pager..."

However, Claim 1 is not directed only to protocol translation, but further recites a specific relationship between an information database configured to identify the different services associated with the sub-networks, ***the different services including protocol translations required to provide the requested service*** (i.e., conference connection), ... and the information processor which is further configured to retrieve sub-networks available to provide the requested service (i.e., conference connection) ***based on the different services identified from the database.*** Thus, the protocol translation services are identified in the

database, and then the information processor retrieves a sub-network available to provide the translation based on the database information.

In contrast, Foladare describes that the E-Mail server receives an E-Mail message and then accesses the recipient's record from the database 62.² In addition, Foladare's step 406 determines if the sender ID 233 in the received message 239 matches any of the senders in the sender list 252 of the recipient's record.³ Thus, the information stored in the database 62 of Foladare does not identify different services associated with the sub-networks, with each service *including protocol translations required to provide the requested service* (i.e., conference connection), as recited in independent Claim 1. Specifically, the database of Foladare does not identify protocol translation services, whatsoever. Instead, the database of Foladare simply stores user profile information, which can not reasonably be considered as data that identifies a protocol translation service associated with a sub-network.

Further, "[i]n relying upon the theory of inherency, the Examiner must provide a basis in fact and/or technical reasoning to reasonable support the determination of the allegedly inherent characteristic necessarily flow from the teachings of the applied prior art." See Ex parte Levy, 17 USPQ2d 1461, at 1464 (Bd. Pat. App. & Inter. 1990) and M.P.E.P. § 2112.

As discussed above, simply because the device of Foladare may be capable of sending messages to facsimile or printing devices, it does not necessarily follow from these teachings that Foladare includes a database identifying different services associated with the sub-networks, each service *including protocol translations required to provide the requested service* (i.e., conference connection), as recited in independent Claim 1.

Independent Claim 1 also recites that "the information processor is further configured to retrieve sub-networks available to provide the requested service (i.e., conference connection) *based on the different services identified from the database.*"

² Id., col. 4, lines 55-64, and Figs. 2 and 4.

³ Id., co. 4, line 65-col. 5, line 10.

In addressing this claimed feature, the Official Action cites Fig. 1 of Foladare. However, Fig. 1 simply shows a conventional network structure, and does not teach or suggest retrieving sub-networks available to provide the requested service (i.e., conference connection) ***based on the different services identified from the database***, as recited in independent Claim 1. As noted above, the Official Action relies on database 62 of Foladare to address the database feature recited in the claims. Foldare's database, however, stores user profile and forwarding information, and does not facilitate retrieving sub-networks available to provide the requested service (i.e., conference connection) ***based on the different services identified from the database***, as recited in independent Claim 1.

Therefore, for at least the reasons discussed above, the applied reference fails to teach or suggest every feature recited in Applicants' claims, and Claims 1-3, 5-14 and 16-21 are patentably distinct over Foladare. Accordingly, Applicants respectfully traverse, and request reconsideration of, the rejection based on Foladare.

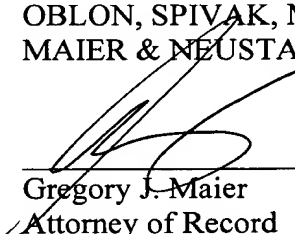
Consequently, in view of the present Amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance. A Notice of Allowance for Claims 1-3, 5-14 and 16-21 is earnestly solicited.

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Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

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